

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
) Case No.
vs.) 3:17-cv-000939-WHA
)
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO LLC; OTTO TRUCKING,)
INC.,)
)
Defendants.)
_____)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF SIDNEY MAJALYA
San Francisco, California
Wednesday, December 20, 2017
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2779413

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1 don't -- but Salle may have already been on it. So 13:47:27
2 I don't exactly remember who she forwarded the
3 e-mail to.
4 Q Do you know if Mr. Kalanick forwarded
5 Mr. Jacobs' e-mail to anyone? 13:47:40
6 A I don't.
7 Q Do you know if Ms. Hazelbaker forwarded it
8 to anybody?
9 A I didn't even recall that she received it.
10 Q If you look at the bottom of Exhibit 9659, 13:47:49
11 you'll see that she's on the e-mail from Mr. Jacobs,
12 right?
13 A Yes.
14 Q Do you see that Ms. Hornsey is also on the
15 e-mail? 13:47:57
16 A I do.
17 Q Do you know if Ms. Hornsey forwarded
18 Mr. Jacobs' resignation e-mail to anybody?
19 A I do not.
20 Q When you received Mr. Jacobs' resignation 13:48:07
21 e-mail, who did you discuss it with, other than
22 Mr. Spiegler and Ms. Yoo?
23 A I think I already testified that I
24 discussed it at some point with Ms. Padilla.
25 Q Anybody else? 13:48:22

1	A I do.	14:07:01
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2 Q So he was forwarding Mr. Jacobs' lawyer's
3 demand letter to those people on the e-mail chain,
4 right?

5	MS. DUNN: Objection. Foundation.	14:07:12
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6 THE WITNESS: Apparently. So it appears.

7 BY MR. EISEMAN:

8 Q And who are those people that he forwarded
9 the e-mail to?

10	A I have no idea, other than Stacey	14:07:21
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11 Sprenkel, who I said earlier was working with us on
12 our assessment. I don't know any of the other
13 individuals.

14 Q Well, you know Arturo Gonzalez, don't you?

15	A I know who he is.	14:07:34
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16	Q	Right.
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17 A But I -- I know that he represents Uber in
18 the Waymo case.

19	Q Do you have any information as to why	
20	Mr. Duross sent the April 19th Jacobs demand letter	14:07:43
21	to this group of people?	

22 MS. DUNN: Objection. Form.

23 THE WITNESS: I do not.

24 BY MR. EISEMAN:

25	Q Were these some of the people who were	14:07:53
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1 A I don't -- that's an excellent question. 14:51:13

2 I don't exactly know.

3 Q Did you interact with O'Melveny & Myers in
4 connection with any of Mr. Jacobs' allegations?

5 A I've interacted with O'Melveny & Myers, 14:51:29
6 but I would not say it was specifically related to
7 the allegations in the Jacobs letter.

8 Q What about Mr. Jacobs' allegations
9 generally, not just limited to the letter? Did you
10 interact with O'Melveny & Myers? 14:51:43

11	MS. DUNN: Form.
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12 THE WITNESS: Not with respect to Jacobs.

13 BY MR. EISEMAN:

14	Q Did you interact with Shearman & Sterling	
15	with regard to Mr. Jacobs' allegations?	14:51:52

16 A We may have had one meeting, one or two
17 conversations with Patrick Robbins about the Jacobs
18 matter.

19	Q	When you say "we," do you mean you and Joe	
20	Spiegler?		14:52:14

21 A Joe Spiegler and myself. Yeah.

22 Q Do you know when that meeting took place?

23 A I don't. Likely it would have been in the
24 June time frame at some point, but I don't have a
25 specific recollection. 14:52:29

1 those are the people that I recall having any 15:06:08
2 knowledge or interaction about the Jacobs letter and
3 allegations.

4 Q Do you know if anybody besides Ms. Padilla
5 and the litigation group at Uber knew about the 15:06:18
6 letter?

7 A Oh, let me -- I'm sorry. Let me add one
8 more person to my prior answer.

9 I believe Candace Kelly at some time also
10 knew. 15:06:31

11 Q Right. Okay. Anybody else?

12 A No. I'm sorry. If you could repeat your
13 last question.

14 Q Yeah.

15 Do you know if anybody within the Uber 15:06:40
16 litigation group knew about the Jacobs issues?

17 A Other than Angela, I don't think so.

18 And again, when you say "the litigation
19 group," the litigation and employment group are both
20 under Angela's auspices, but I'm separating them for 15:07:04
21 purposes of this response.

22 MR. EISEMAN: All right. Let's mark as
23 Exhibit 9664 the next document.

24 (Exhibit 9664 was marked for
25 identification and is attached hereto.) 15:07:21

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: December 21, 2017

22 

23 CARLA SOARES

24 CSR No. 5908